Schary, Claire

From: Schary, Claire

Sent: Thursday, September 26, 2013 10:51 AM
To: Carrie Sanneman; Bobby Cochran
Subject: Comments on compliance & enforcement

Attachments: Discussion Guide_Permitting Compliance Enforcement_2013 08 08 (Chae Comment).docx

Carrie & Bobby,

Chae Park works in our NPDES Enforcement unit and wanted to participate in this JRA project but his very heavy workload has prevented him from being able to attend any of the meetings so far. He and Dustan have reviewed the documents before the meetings together so that Dustan could try to represent Chae's perspective at the meetings. However, Chae has taken the time to review the Discussion Guide prepared for the August meeting and just now provided comments that I thought you should read and consider as you put together the draft set of recommended practices and/or structure the discussion at the Oct. meeting. I've also asked him if he can participate in the meeting for at least one day and if he'd like the compliance and enforcement part discussed at a certain time so that he can be sure to be there. I'll let you know as soon as he responds.

FYI, I explained to Chae that I couldn't guarantee his comments will be reflected in that draft because they are coming in a little late in your process for preparing the draft document, but said they are still useful and can be raised in the Oct. meeting. I also told him that we pointed out to you in the August meeting that many of the practices in these draft documents seem to be written solely from the perspective of temperature credits and did not reflect enough about how it would look for a different pollutant. Some of his comments show that he is thinking about how this would work for pollutants other than temperature.

-- Claire

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